

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

KTRV LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10601 (MFW)

(Jointly Administered)

Re: Docket Nos. 493, 560 & 573

**NOTICE OF FILING OF REVISED PROPOSED FINDINGS OF FACT AND
CONCLUSIONS OF LAW (I) APPROVING DISCLOSURE STATEMENT ON
A FINAL BASIS; AND (II) CONFIRMING COMBINED DISCLOSURE
STATEMENT AND PLAN OF LIQUIDATION DATED SEPTEMBER 1, 2025**

PLEASE TAKE NOTICE that, on September 1, 2025, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors,” or the “Plan Proponent”) filed the *Combined Disclosure Statement and Plan of Liquidation Dated September 1, 2025* [D.I. No. 493] (the “Plan”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that, on October 10, 2025, the Debtors filed the *Notice of Filing of Proposed Findings of Fact and Conclusions of Law (I) Approving Disclosure Statement on a Final Basis; and (II) Confirming Combined Disclosure Statement of Plan of Liquidation Dated September 1, 2025* [D.I. No. 560].

PLEASE TAKE FURTHER NOTICE that, on October 20, 2025, the Debtors filed the *Notice of Filing of Revised Proposed Findings of Fact and Conclusions of Law (I) Approving Disclosure Statement on a Final Basis; and (II) Confirming Combined Disclosure Statement of Plan of Liquidation Dated September 1, 2025* [D.I. No. 573] (the “Proposed Confirmation Order”).

¹ The Debtors in these chapter 11 cases, along with each the last four digits of each Debtor’s tax identification number, are as follows: KTRV LLC (9993), Heritage Coal & Natural Resources, LLC (8326). The Debtors’ service address is 1521 Concord Pike, Suite 201, Wilmington, DE 19803.

PLEASE TAKE FURTHER NOTICE that a hearing (the “Confirmation Hearing”) to consider confirmation of the Plan and final approval of the Disclosure Statement was held on October 20, 2025 at 11:00 a.m. (prevailing Eastern Time) before the Honorable Mary F. Walrath, at the conclusion of which, the Court issued its ruling with respect to proposed releases under the Plan.

PLEASE TAKE FURTHER NOTICE that a status conference to consider confirmation of the Plan and final approval of the Disclosure Statement is scheduled for October 23, 2025 at 10:00 a.m. (prevailing Eastern Time) before the Honorable Mary F. Walrath.

PLEASE TAKE FURTHER NOTICE that, in connection with the Plan, and consistent with the Court’s ruling at the Confirmation Hearing, the Plan Proponent hereby files a copy of the further revised proposed form of order confirming the Plan and approving the Disclosure Statement on a final basis, a copy of which is attached hereto as **Exhibit 1** (the “Revised Proposed Confirmation Order”).

PLEASE TAKE FURTHER NOTICE that a redline comparing the Revised Proposed Confirmation Order against the Proposed Confirmation Order filed on October 20, 2025, is attached hereto as **Exhibit 2**.

PLEASE TAKE FURTHER NOTICE that, to the extent that the Plan Proponent makes further revisions to the Proposed Confirmation Order prior to the Confirmation Hearing, the Plan Proponent will present further redlined copies of such revised documents to the Court either at or

before the Confirmation Hearing.

Dated: October 23, 2025
Wilmington, Delaware

MORRIS JAMES LLP

/s/ Jeffrey R. Waxman

Jeffrey R. Waxman (DE Bar No. 4159)

Eric J. Monzo (DE Bar No. 5214)

Christopher M. Donnelly (DE Bar No. 7149)

Samantha L. Rodriguez (DE Bar No. 7524)

3205 Avenue North Blvd., Suite 100

Wilmington, DE 19803

Telephone: (302) 888-6800

Facsimile: (302) 571-1750

E-mail: jwaxman@morrisjames.com

emonzo@morrisjames.com

cdonnelly@morrisjames.com

srodriguez@morrisjames.com

Counsel to the Debtors and Debtors in Possession